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OPPINE SECRETARY

January 25, 2001

Mr. David Waddell Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee

RE: BellSouth Tariff to Obsolete Connectionless Data Service (CDS), Docket No. 01-00008 TRA Data Request, dated January 11, 2001

Dear Mr. Waddell:

This is in response to the Authority's Data Request, dated January 11, 2001.

The Staff requested that we demonstrate in detail how the proposed tariff complies with the following requirements set forth in the Authority's October 22, 1998 Order in Docket 97-01387. Our responses to these requirements are as follows:

ITEM 1: Existing customers must first be notified of the discontinuation of service and allowed time to obtain service from an alternative provider.

RESPONSE: With respect to the proposed tariff to delete CDS from the Access Services Tariff (Section E21), there are no existing customers for this service. Therefore, no notification is required.

With respect to the proposed tariff to obsolete CDS in the General Subscriber Services Tariff (GSST, Sec A40), existing customers will be allowed to keep their current service after this tariff becomes effective. When BellSouth identifies a date for discontinuing this service, existing customers will be notified in writing 60 days in advance of the date. In addition, BellSouth will submit this date to the Authority for review and approval.

ITEM 2: The Date for discontinuation of the grandfathering period must be approved by the Authority.

RESPONSE: With respect to the proposed tariff to delete CDS from the Access Services Tariff (E21), the purpose of this filing is to request approval from the Authority to discontinue this service.

With respect to the proposed tariff to obsolete CDS in the GSST, Sec A40, BellSouth has not yet identified a date to disconnect this service. Once this date has been identified, BellSouth will submit this date to the TRA for review and approval.

ITEM 3: An open enrollment period must be offered to permit additional customers to sign on before the service is discontinued.

RESPONSE: Both tariffs (CDS under the Access Services Tariff and under the GSST) are still in effect, and any customer wishing to order services under these tariffs may do so until this proposed tariff is approved by the TRA. Therefore, an "open enrollment" period already exists.

ITEM 4: If the service is to be discontinued while grandfathered customers are still enrolled, written notification of the plan's termination shall be provided to existing customers at least 60-days prior to the plan's proposed termination.

RESPONSE: With respect to the proposed tariff to delete CDS from the Access Services Tariff (Section E21), there are no existing customers for this service. Therefore, no notification is required.

With respect to the proposed tariff to obsolete CDS in the General Subscriber Services Tariff (GSST, Sec A40), existing customers will be allowed to keep their current service after this tariff becomes effective. As indicated in the response to Item (1), when BellSouth identifies a date for discontinuing this service, existing customers will be notified in writing 60 days in advance of the date. In addition, BellSouth will submit this date to the TRA for review and approval.

In addition to the responses listed above, we wish to provide additional information as support for this tariff filing. Because of customer interest in other packet services such as Frame Relay and Asynchronous Transfer Mode (ATM), the data telecommunications industry has virtually abandoned the development of any new CDS capabilities. As a result, future support for CSA from equipment vendors and other service providers is expected to diminish. For example, most Interexchange Carriers currently do not transport CDS and BellSouth's customers are only able to use this service for IntraLATA applications. CDS customers have alternatives to CDS such as Frame Relay and ATM services that will continue to have industry support well into the future.

BellSouth has taken steps to facilitate customer migration from CDS to Frame Relay and ATM services. For example, BellSouth's current tariffs for Frame Relay Service and ATM Service waives the non-recurring charge for any existing customer who wishes to either of these service from CDS (General Subscriber Services Tariff Secs. A40.1.2.D.3 and A40.8.2.D.3). In addition, the proposed tariff permits an existing customer to move to a new service without a Termination Liability Charge (Proposed Tariff, Sec. A140.4).

We trust that this information will assist the Staff in their review of this tariff filing. Please direct any questions regarding this information to me or Paul Stinson at 214-3839.

Yours truly,

Charie Honneth

cc: Consumer Advocate